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United States of America

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RAYMOND BREWER,

15 Defendant.

CASE NO. 1:20-CR-00198-JLT-SKO

JOINT STIPULATION AND [PROPOSED]
ORDER EXTENDING THE UNITED
STATES' DEADLINE TO FILE AN
OPPOSITION TO LC EQUITY GROUP,
INC.'S MOTION FOR ORDER EXPUNGING
LIS PENDENS (Doc. 32)

Date: TBD
Time: TBD
Courtroom: TBD

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18 On October 29, 2020, defendant Raymond Brewer was charged by indictment with wire
19 fraud (Counts One through Nine – 18 U.S.C. § 1343), aggravated identity theft (Count Ten - 18
20 U.S.C. § 1028(A)(a)(1)), and money laundering (Counts Eleven through Sixteen - 18 U.S.C. §
21 1956(a)(1)(B)(i) and Counts Seventeen through Twenty-Four 18 U.S.C. § 1957). Doc 1. The
22 indictment sought forfeiture of Brewer's interest in all property which constitutes or is derived
23 from proceeds traceable to a violation of 18 U.S.C. § 1343, and any property involved in or
24 traceable to a violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1957. *Id.*, Forfeiture Allegation.
25 That property included the following:

26 a. Real property located at Lot 1 Mountain View Road, Montana, Madison
27 County, APN: 25-0506-13-1-01-05-0000;

28 b. Real property located at 804B E. Worth Avenue, Porterville, Tulare

County, California, APN: 271-060-019-000.

On November 18, 2020, the United States recorded its Lis Pendens Notice of Pending Action with the Tulare County Recorder's Office against the property that is the subject of this motion. *See* Doc. 19. The United States provided notice by certified mail to the individuals or entities on title to the real property, one of whom is LC Equity Group. *See* Doc. 19 at p. 7. On May 25, 2021, the United States filed its recorded lis pendens in this case. Doc. 19.


On January 27, 2022, LC Equity Group, Inc. filed a motion for order expunging the lis pendens. Doc. 32. A hearing date has not yet been set by the court. Pursuant to Local Rule 430.1(d), opposing papers are due within seven days of the filing of the motion which places the United States' deadline to file its opposing papers on Thursday, February 3, 2022. Counsel for the United States and counsel for LC Equity Group have met and conferred regarding the Motion and agree to extend the time for the United States to oppose the Motion while the parties continue discussions regarding the Motion. Accordingly, with the Court's approval, the United States and LC Equity Group, Inc. hereby stipulate and agree that the United States' opposition to the motion be extended to February 24, 2022.

Dated: February 3, 2022

PHILLIP A. TALBERT
United States Attorney

By: /s/ Alyson A. Berg
JOSEPH BARTON
HENRY Z. CARBAJAL III
ALYSON A. BERG
Assistant United States Attorneys

Dated: February 3, 2022

By: 
RICHARD J. REYNOLDS
Attorney for LC Equity Group, Inc.

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ORDER

Before this Court is the United States' stipulated request for an order extending the opposition as proposed by the parties. The proposed filing date is adopted herein.

IT IS SO ORDERED.

Dated: February 3, 2022


JENNIFER L. THURSTON
UNITED STATES DISTRICT JUDGE